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June 18, 2003

Melinda Artman, Zoning Administrator  
Department of Building and Development  
1 Harrison Street, S.E.  
P.O. Box 7000  
Leesburg, VA 20177-7000

*Re: Loudoun County Zoning Ordinance*

Dear Ms. Artman,

Please find attached an Editorial Report I have prepared for the work I did on your Zoning Ordinance. The purpose of this report is to inform you of the style in which I have edited the Zoning Ordinance, and what changes I might have made and the reasons for those changes. I have followed the instructions you sent with the Zoning Ordinance and have made no changes to content, except where I found errors or inconsistencies. I have noted any such changes, which I made pending your approval. In those instances that I found a problem that I could not resolve, I have asked for your advice in making any necessary changes. Regarding this last item, I have included some questions which will require responses in order for me to proceed.

I hope this report helps to clarify the procedure I followed in editing the Zoning Ordinance. If you have any questions or problems while reviewing the Zoning Ordinance, please do not hesitate to call or e-mail me. I hope my editing meets with your approval, and look forward to hearing from you and working with you to complete this project.

Sincerely,

David Geers  
Editor

Dgeers@amlegal.com

*Zoning Ordinance, Loudoun County, Virginia*  
*Editorial Report*  
*David Geers*  
*June, 2003*

**General**

Any changes I made to the Zoning Ordinance were for the sake of uniformity and consistency. I found that the systems of numbering, formatting, etc., vary in some places, which I attributed to the Zoning Ordinance being done over ten years and possibly by different people. I have attempted to keep everything consistent throughout. Nothing I have done has altered the content of the Zoning Ordinance. The following are the general changes I made, and any questions I had that I could not resolve, or which needed approval before being changed.

The system of divisions within each section of the Zoning Ordinance was inconsistent. In some places the sections were broken down as follows:

- (A)
  - (1)
    - (a)
      - (i)

In others, they were:

- (A)
  - (1)
    - (A)
      - (1)

In still others, they were:

- (A)
  - (1)
    - A.
      - (i)

For the sake of consistency, I have adopted the following system throughout the Zoning Ordinance:

- (A)
  - (1)
    - (a)
      - 1.
        - a.
          - (i)

Is this acceptable?

**Virginia Statutes:** I found references to the Virginia Statutes listed several different ways. For consistency, I have listed all references as follows: "Section xx-xx of the Code of Virginia." This seems to be the most prevalent, and it is the way the statutes are listed in the Codified Ordinances. Is this acceptable?

## **Loudoun County Zoning Ordinance - Editorial Report**

**Deleted material:** Sections that were listed as having been deleted, such as 4-1500, FOD, Floodplain Overlay District, I listed as reserved. I didn't think there was any reason to list a district that no longer exists. Is this acceptable?

There were some instances when I found sections or subsections with only one item; such as only a subsection (A), or only a paragraph (1). In accordance with American Legal's practice of always providing at least two subsections or paragraphs when they are enumerated in this manner, I either combined the single item with the introductory paragraph and/or renumbered or re-lettered the section. For example, Section 4-1314 had only a subsection (A) with several paragraphs:

### **4-1314 Common Areas, Recreational Facilities.**

#### **(A) Ownership, Operation and Management of Common Open Space and Common Facilities.**

- (1) All common open space and common facilities shall be preserved for its intended purpose as expressed in the concept development plan. The developer shall choose prior to approval of the first record plat or final site plan, one or a combination of the following methods of administering common open space:
  - (a) Establishment of a nonprofit association, corporation, trust, or foundation of all owners of residential property within the planned development. Such organization shall conform to the following requirements:
    1. The organization must be established prior to.....
- (2) All common open space shall be subject to. . . . .
- (3) All common open space, as well as . . . .

I have changed this to the following:

### **4-1314 Common Areas, Recreational Facilities; Ownership, Operation and Management of Common Open Space and Common Facilities.**

- (A) All common open space and common facilities shall be preserved for its intended purpose as expressed in the concept development plan. The developer shall choose prior to approval of the first record plat or final site plan, one or a combination of the following methods of administering common open space:
  - (1) Establishment of a nonprofit association, corporation, trust, or foundation of all owners of residential property within the planned development. Such organization shall conform to the following requirements:
    - (a) The organization must be established prior to approval of the first record plat or final site plan in the proposed development. The documents establishing such organization shall be reviewed and approved by the County. . . . .

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(B) All common open space shall be subject to. . . .

(C) All common open space, as well as . . . .

In this case, I have made the change to the section heading in the Table of Contents as well. Is this acceptable?

**Numbers.** There was a good deal of inconsistency throughout the Ordinance regarding numbers and percentages. In many places, numbers are spelled out, followed by the numerals in parentheses, such as "twenty thousand (20,000) square feet." In just as many places, they are not spelled out, and the numerals only are used. In still other places, they were spelled out only, and no numerals were used. For the sake of consistency, I have adopted American Legal's numbering system, which is as follows: Numbers under 11 are spelled out, unless they are in a section which contains a great deal of dimensions or specifications, in which case numerals only are used. For any number over ten, numerals only are used in every instance, except when that number begins a sentence; however, in sections which contain many dimensions or specifications, all numbers are expressed in numerals regardless of whether or not they begin a sentence. Ordinal numbers, in the few places where they occur, are spelled out: forty-fifth, rather than 45<sup>th</sup>. All percentages are expressed in numerals only, followed by a percent sign: 35%, rather than thirty-five (35) percent, except where they begin a sentence, in which case they are spelled out. Is this acceptable?

### **Internal references**

References to other sections, subsections, and paragraphs within the Zoning Ordinance became confusing at times due to some inconsistencies. Sometimes (A) of a given section was referred to as a section, sometimes as a subsection, sometimes a paragraph. I have referred to all main sections (4-100, 4-200, etc.) as sections; all sections within those main sections (4-101, 4-102, 4-103) as sections; (A), (B), (C) etc., of those sections as subsections; anything broken down further ((A)(1), (A)(2), (A)(3)(a)) as paragraphs. Many references were written as follows: "A 50-foot management buffer measured from the edge of the 100-year floodplain in (A)(1)(a)1." In such cases I have added no designation before the reference.

In many instances I had some difficulty understanding what was being referred to if the reference was simply to "this section." For example, there are quite a few references to "this section" in Section 5-1508, and in many cases I'm not sure if the reference is to 5-1508 or to all of the comprehensive Section 5-1500. In places where it was clear to me what was being referenced, I made the reference to "...this Section 5-1500..." if the reference is clearly to the more comprehensive section, or "...this Section 5-1508..." if it is clear that the reference is more specific. In those

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places where it was not clear to me what was being referenced, I have done nothing, leaving the reference simply as "this section."

Is all of this clear, and is it acceptable?

### **Formatting of sections**

I have formatted the text of the Ordinance so as to be consistent with the way it was formatted as I received it. In some parts of the Ordinance the section number was flush against the left margin, and in others one indent was used. For consistency, I have started all section headings flush with the left margin throughout the Zoning Ordinance.

All section headings and captions are in bold. All section and subsection headings are all capitals. One change I did make was to capitalize only the initial word of all paragraphs. I did this because this is the way paragraphs are formatted in the Codified Ordinances. For example, Section 4-2003 is formatted as follows:

#### **4-2003      Applicability and Exemptions.**

- (D) **Zone District Development and Dimensional Standard Flexibility Provisions.** When 25% or more of the total area .....
- (1) **Minimum lot size.** No minimum.
  - (2) **Minimum lot width.** No minimum.
  - (3) **Minimum yards.**
    - (a) **Residential.** No minimum.

Is this acceptable?

### **Formatting of pages**

All pages have margins of 0.8" at the top, bottom and both sides, as instructed. Tabs sets are 0.35". Headers denote the first section or subsection on any given page. Footers have numbers at the bottom of the page and the reprint date, January 7, 2003. Headers and footers are alternated so that the section number and reprint date are always on the outside. Headers also say "LOUDOUN COUNTY ZONING ORDINANCE" on all even-numbered pages, and the title of the particular section on odd-numbered pages. For example, the odd-numbered pages in Section 1-400 have "Nonconformities" as the header. The first page of each section has no header, and starts with the section number and title on the first line of the page. Every main section ends on a even-numbered page, so on those pages where the text actually

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ends on an odd-numbered page, I have added a blank page with an even number. This is in accordance with American Legal's practice of always starting a new chapter, or in this case a new main section, on an odd-numbered page. These blank pages have no footer, except for the page number. Is all of this acceptable?

### **Page numbering**

I have formatted the pages of the Articles per your instructions: 1-1, 1-2, 1-3 and so on. For the Table of Contents I made these TOC-1, TOC-2 etc.; for the Index they are Index-1, Index-2, etc.; for the Index of Zoning Ordinance Amendments, ZOAM Index-1, ZOAM Index-2, etc. The resolution and dedication pages I numbered with lower-case Roman numerals, much like a preface in a book. Is this acceptable?

### **Tables**

All tables have borders on all four sides. While the text of the Zoning Ordinance is in 12-point type, all tables are done in 10-point type; this appears to be the way they were done in the past, and it made them much easier to work with. The one exception to this is the Sign Requirements Matrix, which I found extremely difficult to work with, and which I had to reduce to 6-point type in order to fit all the information in.

### **Resolution**

I have checked the Resolution for spelling errors, but aside from correcting any of those, I have made no changes, except to add page numbers at the bottom. I have not applied any of the other formatting mentioned above, but have retained the formatting of the Resolution exactly as I received it. In some instances I couldn't help carrying text over to the next page, and when this occurred, I was able to correct it on the next page. Please verify that the signature on page 7 of the Resolution is correct. The last name looked like Rhys, but I wasn't completely sure. Is this acceptable?

### **Dedications**

I have included the dedications pages at the end of Resolution, for lack of a better place to put them. This can be changed if you would like these pages elsewhere. Is this acceptable?

### **Index of Zoning Ordinance Amendments**

I did this Index in a 10-point font. That's what the original appears to be, and it made it much more manageable.

## **Loudoun County Zoning Ordinance - Editorial Report**

ZOAM 2002-0002, Adopted 4-15-02, appears in this Index but is not listed on the cover. I have entered this date on the cover in the appropriate place. Is this acceptable?

July 2, 2002 appears on the cover, but there is nothing in this Index that corresponds to that date. Please advise as to what, if any, corrections I should make regarding this entry.

When I used this Index I found myself getting confused as to which amendment I was looking at from one page to the next. For this reason, when an amendment carries over for two or more pages, I have inserted the amendment number and passage date on the first line of a given page.

I noticed that the subjects under a given article of a given amendment are roughly in numerical, rather than alphabetical order. For example, under ZOAM 1993-0002, Article II, "Rural Agricultural Corporate Retreat" is listed first, and "Access" is listed last. I debated rearranging these alphabetically, but as they are more or less in numerical order and have been that way over the years, I decided this was the system you preferred and left it unchanged. Is this correct?

**ZOAM 1994-0005, Adopted 12-21-94**

### **"ARTICLE V OFF-STREET PARKING AND LOADING REQUIREMENTS:"**

#### **Number of Parking and Loading Spaces Required**

Add parking requirements for Active Adult/ Age Restricted District"	5-1102(D)	Required Spaces
--	-----------	-----------------

Article V is ADDITIONAL REGULATIONS AND STANDARDS. I changed this entry to:

### **ARTICLE V ADDITIONAL REGULATIONS AND STANDARDS:**

#### **DIVISION B: OFF-STREET PARKING AND LOADING**

#### **Number of Parking and Loading Spaces Required**

Add parking requirements for Active Adult/ Age Restricted District	5-1102(D)	Required Spaces
---	-----------	-----------------

Is this acceptable?

**ZOAM 1994-0001, Adopted 4-6-94**

### **ARTICLE IV PD-IP DISTRICT REGULATIONS:**

Article IV is PLANNED DEVELOPMENT DISTRICT REGULATIONS. I changed this entry to:

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### ARTICLE IV ~~PLANNED DEVELOPMENT DISTRICT REGULATIONS:~~

#### ~~PD-IP District Regulations:~~

Is this acceptable?

In the early Zoning Amendments, Article IV is titled "PLANNED DEVELOPMENT DISTRICT REGULATIONS." Its title now is "SPECIAL AND OVERLAY DISTRICTS." Am I correct in assuming that this is a change that was made over the years? For that reason I haven't changed any of these entries.

### Article I

No questions or comments.

### Article II

- 2-909     "Administrative Reductions, Waivers, or Modifications of Parking Requirements.**  
The Zoning Administrator may grant administrative reductions, waivers, or modifications of parking requirements for permitted or special exception uses contained in Sections 2-903 and 2-904 above, in accordance with the provisions of Section 5-1100(F), as applicable."

Section 5-1100 is the comprehensive Section: Off-Street Parking and Loading Requirements. There is no Subsection (F). This reference is rather vague, so it's difficult to tell what it should be. Could it be Section 1102(F)? Please review and clarify.

- 2-1303     Table 2-1303.** Under Cultural and Government Facilities, General Government Use, Additional Regulations For Specific Uses refers to Section 5-631, which is Animal Hospitals, which doesn't seem to apply. Section 5-634, Agricultural Cultural Center, sounds like it could possibly apply. The tables in the other sections in Article II have no references at all for anything under Cultural and Government Facilities, so could it be that this should have been left blank? Please advise.

### Article III

- 3-907(A) "Transportation Design.** .....Left-turn storage and right turn lanes and/or traffic dividers shall be required where existing or anticipated heavy flows indicate need."

Is the term *left-turn storage* correct? This doesn't sound like it would apply to traffic. Please clarify.



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- 3-1001 "...This district is to be applied as a long-term, but interim, district, recognizing that areas devoted to resource extraction may and should be converted, ultimately, to other compatible and beneficial uses consistent with the Comprehensive Plan. "
- This seems to contradict itself. Should it be "This district is *not* to be applied as a long-term, but *as an* interim district...."? Please clarify.

### Article IV

- 4-106 **Planned Shopping Centers.** These uses are permissible as provided in Section 4-200(A) and (B) (neighborhood and community centers only).....
- This reference is incorrect. There is no (A) and (B) for Section 4-200. Section 4-200 encompasses all of the material regarding the PD-CC Districts. I have changed this reference to "Section 4-202(A) and (B)" which applies to neighborhood and community centers. Is this correct?
- 4-107(J) **"Signs.** Sign limitations shall be as provided in Section 5-1200 of this Ordinance, with business signs limited as provided in Section 5-1203(R)."
- Section 1203 has only two subsections, (A) and (B). There is no 1203(R). Could this be an old reference that should now refer to the Sign Requirements Matrix? Please advise.
- 4-404(L) ".....glass products made of purchased glass...."
- Should this possibly be "purchased glass"? this also appears in Section 4-503(G)
- 4-505(B)(1) **"Adjacent to roads.** No building, outdoor storage, areas for collection of refuse, or loading area shall be permitted closer than 100 feet to the right-of-way of any arterial road, 75 feet to the right-of-way of a major collector, and 35 feet to the right-of-way from any other road, except as provided in Section 4-505(C)."
- Section 4-505 has only two subsections, (A) and (B). There is nothing else in this section pertaining to uses adjacent to roads. Paragraphs (B)(2) and (B)(3) pertain to uses adjacent to other uses and to other districts. Either of these might be a possibility, but neither really seems to apply. Is it possible that the a Subsection (C) was removed in the past and that the highlighted portion no longer applies and should be removed? Please advise.
- 4-1000 and 4-1100 An abbreviation, WMATA, is used several times in these two sections. From the way it is used, it sounds like some kind of local authority. However, there is no explanation or definition anywhere in the Zoning Ordinance for what this stands for.
- 4-1100 The Transit-Designed Supportive Subarea is also referred to as the Transit-Designed Supportive Area, the latter of which I am guessing is correct, because the abbreviation is TDSA, and it is actually used more often, but sometimes both are used within the same

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paragraph. It is also referred to as the TDSA Subarea, which would stand for Transit-Designed Supportive Area Subarea. Is there any particular one of these that is correct, or are all acceptable?

- 4-1117(G)     **"Credit for On-Street Parking.** In coordination with the Office of Transportation Services and the Virginia Department of Transportation, the Zoning Administrator may allow on-street parking spaces, located within 400 feet of the subject principal use, to be credited to meet up to 30% of the off-street parking spaces for a particular development or building required by Section 4-1115(E). Such credit for on-street parking shall be included on the final development plan so as to identify the particular development receiving the credit."

Section 4-1115 has only two subsections, (A) and (B), neither of which relate to parking. The correct reference might be within 4-1117, but none looks quite right to me. Please advise.

- 4-1204     Table 1     I rearranged this table so that the State Route numbers were in numerical order. Is this acceptable?

- 4-1216 and 4-1217     Several paragraphs in these two sections have the comment (Typical drawings permitted.) at the end of the paragraph. Should these references be more specific, referring to the illustrations at the end of this section, or are they obsolete? Please advise.

- 4-1404(B)(3)     **"Avigation easements.** For all residential dwelling units to be constructed between the Ldn 60-65 aircraft noise contours. Prior to the approval of a Record Plat creating residential lots or for existing lots of record, prior to the issuance of a zoning permit, the owner(s) of such parcel or parcels shall dedicate an avigation easement to the Metropolitan Washington Airports Authority, indicating the right of flight to pass over the property, as a means to securing the long-term economic viability of Washington Dulles International Airport."

Is this word correct? I couldn't find it in any dictionary, and wondered if it should be aviation. Please advise.

- 4-1908(G)     **On-Site Sewage Disposal Systems.**

The reference to the Land Subdivision Development Ordinance, Section 1245.10, was wrong. On-Site Sewage Disposal Systems are in Section 1245.11, which is what I have changed this to. Is this acceptable?

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### Article V

5-400(B) "One employee (one full-time equivalent), other than members of the family residing on premises, shall be permitted given one additional off-street parking space is provided. Such parking space shall not be located in the required front yard, unless located on an existing driveway."

It appears that something was omitted here or should have been; I really don't understand the meaning as it is. Please advise.

5-500(B)(4) No more than two signs consistent with Section 5-1203(S) of this Ordinance shall be permitted.

Section 1203 has only two subsections, (A) and (B). There is no 1203(S). Could this be an old reference that should now refer to the Sign Requirements Matrix? Please advise.

5-601(C)(4)(c) **"Yard standards.** The minimum required yard setback shall be as follows:

1. Level I – small scale: 100 feet minimum from all lot lines.
2. Level II – medium scale: 200 feet minimum from all lot lines.
3. Level III – large scale: 250 feet minimum from all lot lines."

This doesn't appear to correspond to the table in 5-601(C)(4)(a), which has eight levels of uses, not just three. Should the paragraph and the table correspond?

5-604(H) Wayside stands may erect signs in compliance with Section 5-1203(L).

Section 1203 has only two subsections, (A) and (B). There is no 1203(L). Could this be an old reference that should now refer to the Sign Requirements Matrix? Please advise.

5-614(C)(1) **"Home occupation.** Small businesses are permitted in AR, A-3, A-10, TR, CR, and JLMA Districts, subject to the definition of "home occupation" contained in Section 5-400."

"Home occupation" is described but not actually defined in Section 5-400. It is defined in Article VIII. Should I change this reference to reflect where the definition can be found?

5-614(H)(2) **"Special exceptions.** Special exceptions may contain a condition for a site plan, in lieu of a sketch plan as defined herein, when the Board of Supervisors finds such a condition is necessary to mitigate potential off-site impacts of the proposed use. The requirements for submission, review and approval of all site plans shall be in accordance with the specifications of the Land Subdivision and Development Ordinance (LSDO). Small business site plans for parcels greater than five acres shall follow the preliminary/final site plan process set forth in Section 1244.05."

This chapter of the Land Subdivision and Development Ordinance was amended in 2000. The correct reference is now Section 1244.02, which is what I have changed this to. Is this acceptable?

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5-618(C)(2)(a) "In the A-25, A-10, TR, JLMA-1, JLMA-2, JLMA-3, A-3, CR-1, CR-2, CR-3, CR-4, RC, CLI, PD-CC(CC), PD-CC(SC), PD-CC(RC), PD-TC, PD-TREC and PD-TRC Zoning Districts."

The A-25 District no longer exists. Should this simply be omitted or replaced with something else?

### 5-657 **Stockpiling of Dirt.**

All of the references in this section appear to be wrong. References for vehicular circulation, noise, lighting and screening are made to Sections 5-649 and 5-650. Section 5-649 is Outdoor Amphitheaters, and Section 5-650 is Antique Shops. Please check and verify all references in this section. I have changed the references to what I think they should be. Please verify that these are correct.

5-702(F)(3)(e) - (g) For Front and Side Yard, Rear Yard, and Building Height, there was only one column of dimensions. After checking Section 2-300, I decided that these dimensions applied to both the A-3 and the A-10 Districts and inserted them in both columns. Is this correct?

### 5-1204(D) **Sign Requirements Matrix**

(1) The A-25 District, which no longer appears to exist, is mentioned in (5)(a) of this table.

(2) General Notes, 3: The maximum height column does not apply when ground-mounted bonus are obtained. Use the maximum height column for ground-mounted background structure.

Should this be bonuses? Please advise.

5-1403(A)(2) "At the time of planting, all canopy trees shall have a minimum caliper of one inch dba and all understory trees shall have a minimum height of six feet."

No explanation for this abbreviation is given.

5-1414(C) No captions were provided for this subsection or any of its paragraphs. I called this subsection "Trees and Vegetation" and named the paragraphs for the types of tree, etc. that were listed. Is this acceptable?

Additionally, the botanical names in the tables in this section need to be carefully reviewed. "Ginkgo biloba" was spelled "Ginkgo bilboa." I'm not familiar enough with most of the others to catch other possible errors.

5-1510(A) **"Intent Concerning Determinations Involved in Administration and Enforcement of Performance Standards.** Determinations necessary for administration and enforcement of performance standards set forth in this Article range from those which can be made by a reasonable person using normal senses

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~~and no equipment~~ to those requiring great technical competence and complex equipment for precise measurement. It is the intent of this Ordinance that: . . . ."  
I had to read this several times before I understood it. I suggest re-wording this to read "...by a reasonable person using normal senses, ~~without the aid of any~~ ~~and no equipment~~ ....." or something to that effect. Please advise.

6-1803(D)(1) "Encompasses parcels of land or portions thereof adjacent to an arterial street or highway (as designated pursuant to Title 33.1). . . . ."  
Is this Title 33.1 of the Code of Virginia? Please clarify.

6-1900 Most of the references in this section to sections within Section 6-1900 appeared to be wrong. I have changed them to what I thought was correct. Please review.

6-2005(C)(1) "Open space uses as set forth in the definition of "open space" in Article VIII and uses allowed in the open space as part of the ~~residential cluster option in the TR Districts~~ as set forth in Section 5-701."  
Section 5-701 has no provisions for a residential cluster option in the TR Districts. Is something missing?

### Article VII

7-303(F)(2) "**Frontage.** ~~Single-family attached and single-family attached units~~ shall front on a public road, unless the development has received approval for private roads."  
Is there a distinction between "single-family attached" and "single-family attached ~~units~~"? Or should this be "Single-family attached and single-family ~~detached~~ units...."? Or should the second "single-family attached" not be there at all?

This also appears in 7-403(F)(2), 7-603(F)(2) and 7-703(F)(2)

### Article VIII

In some of the definitions, all words were capitalized; in others only the initial word was capitalized. For the sake of uniformity, I have capitalized all words in every definition.

**Buffer Yard Illustration.** This is on the page following the definition of Buffering and Screening, but there are no references to this illustration anywhere in Article VIII.

**Loudoun County Sanitation Authority Water and Sewer Lines map.** The information at the bottom of this illustration is illegible because of the poor quality of the copy of the map that I received. If the County can provide me with a better copy of this map at the next stage, I will be able to correct this.

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**Open Space:** ".....Lot coverage in the **Open Space** shall be limited to 0.01 of the lot."  
Should this be expressed as a percentage, or is it all right as it is?

There were two definitions each for **Setback** and **Silviculture**. For **Setback**, I combined the two, because both seemed to apply and were slightly different. For **Silviculture**, the second definition sounded more detailed and comprehensive, and included what was set forth in the first, so I eliminated the first definition, with the exception of the reference to Forestry. Is this acceptable?

**Small Business:** This definition also contains definitions for Accessory Building, Business Vehicles, Employees, Heavy Equipment, Small Business and Storage Yard. Except for Employees, each of these is defined elsewhere in Article VIII. Two of these, Business Vehicle and Heavy Equipment, are defined differently in the other locations. Small Business is defined within the definition of Small Business. Should all of these terms actually be defined here, or should they simply be referenced? Please advise.

**Testing Station:** Land and/or structures for the purpose of testing electromagnetic waves utilized for radios, television, microwave, radar, and other means of communication. This use shall not include testing operations for light, X-ray, radioactive emissions, or any other emissions dangerous to human health. (Added January 17, 1984.)

Should the highlighted portion be retained?

**Winery, Virginia Farm:** The second-last sentence of this definition has some incomplete clauses. I suggest adding the following:

"Accessory uses at a **Virginia Farm Winery** may include commercial wineries, wine-tasting rooms at which wine tasting occurs, accessory food sales related to events at which wine tasting occurs, and places at which wines produced on-site are sold."

Should I proceed with this change?